

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

a). 2020 Jeep Grand Cherokee, VIN:
1C4RJECG4LC118369;

b). Glock 19X Pistol, Serial Number:
CAHU537,

c). Glock 23 Pistol, Serial Number:
BUCY637,

Defendants *In Rem*.

CIVIL No.:

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

TO THE HONORABLE COURT:

COMES NOW, the United States of America to bring this Verified Complaint for Forfeiture *In Rem* pursuant to Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* brought to enforce the provisions of 21 U.S.C. § 881(a)(4) and (a)(11); and 18 U.S.C. §§ 924(d), 981(a)(1)(A) and (C).

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C.

§ 1355; and over this particular action pursuant to 21 U.S.C. §§ 881(a)(4) and (a)(11); and 18 U.S.C. §§ 924(d), 981(a)(1)(A) and (C).

3. Venue is proper in this district and the Court has *in rem* jurisdiction over the Defendants *in Rem* pursuant to 28 U.S.C. § 1355(b)(1)(A) because the acts and omissions giving rise to the forfeiture occurred in this district.

DEFENDANTS *IN REM*

4. The Defendants *in Rem* are a). 2020 Jeep Grand Cherokee, VIN: 1C4RJECG4LC118369; b). Glock 19X Pistol, Serial Number CAHU537; and c). Glock 23 Pistol, Serial Number: BUCY637 seized on December 14, 2023, Ave. Manuel Fernandez-Juncos, San Juan, Puerto Rico. Victor Urena-De la Rosa claims that he is the owner of the above described 2020 Jeep Grand Cherokee and the Glock 19X pistol. Carlos Hernandez-Cesar claims that he is the owner of the above described Glock 23 Pistol.

5. The Defendants *in Rem* are within the possession, custody, or control of the United States.

BASES FOR FORFEITURE

6. The Defendants *in Rem* are subject to forfeiture pursuant to:
- a. 21 U.S.C. § 881(a)(4), as a conveyance, aircraft, vehicle, or vessel which was used, or was intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of property described in 21 U.S.C. § 881(a)(1), (2), or (9).
 - b. 21 U.S.C. § 881(a)(11), as any firearm (as defined in section 921 of Title 18) used or intended to be used to facilitate the transportation, sale, receipt,

possession, or concealment, of property described in [paragraph (1) or (2) and any proceeds traceable to such property.

- c. 18 U.S.C. § 924(d), as any firearm or ammunition involve or used in the commission of those offenses in violation of 924(c) (possession of a firearm in furtherance of drug trafficking).
- d. 18 U.S.C. § 981(a)(1)(A), as any property, real or personal, involved in a transaction or attempted transaction in violation of sections 1956, 1957 or 1960 of this title or any property traceable to such property.
- e. 18 U.S.C. § 981(a)(1)(C), as any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting a specified unlawful activity.

FACTS SUPPORTING FORFEITURE

7. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Russell E. Booker, special agent for the United States Department of Justice, Drug Enforcement Administration.

CLAIM FOR RELIEF

The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *in Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *in Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further

relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this day of 2024.

W. STEPHEN MULDROW
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